

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**PLAINTIFFS' RULE 26(a)(3) PRETRIAL DISCLOSURES**

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) respectfully submit their Pretrial Disclosures in the above-captioned action, pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and this Court’s July 28, 2016 and December 7, 2016 Orders (Dkt. Nos. 35, 125). These disclosures are preliminary, as Plaintiffs have not yet received Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A.J. Dwoskin & Associates, Inc.’s (“Defendants”) witness list, exhibit list, or other pretrial disclosures. Plaintiffs further reserve the right to supplement, augment, or otherwise modify these disclosures based on circumstances that may evolve up until and during the time of trial.

- I. **FRCP 26(a)(3)(A)(i)**: the name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises

Plaintiffs identify the following witnesses they expect to call at trial. Plaintiffs reserve the right to add and remove witnesses and to change the designation of witnesses' testimony—e.g., from “may call” to “will call”—as appropriate and necessary. Plaintiffs also expressly reserve the right to call live or by deposition transcript: (1) any witness on Defendants' witness list; (2) any witness necessary to establish a foundation for the admission of records or other evidence; and/or (3) any rebuttal/impeachment witness not listed here should the need arise.

**Plaintiffs will call:**

1. **Rosy de Beltrani Giron de Reyes**  
c/o Undersigned Plaintiffs' Counsel
2. **Jose Dagoberto Reyes Vides**  
c/o Undersigned Plaintiffs' Counsel
3. **Ruth Maday Rivas Abarca**  
c/o Undersigned Plaintiffs' Counsel
4. **Felix Alexis Bolaños Berrios**  
c/o Undersigned Plaintiffs' Counsel
5. **Esteban Ruben Moya Yrapura**  
c/o Undersigned Plaintiffs' Counsel
6. **Yovana Jaldin Solis**  
c/o Undersigned Plaintiffs' Counsel
7. **Rosa Elena Amaya Iraheta**  
c/o Undersigned Plaintiffs' Counsel
8. **Herbert David Saravia Cruz**  
c/o Undersigned Plaintiffs' Counsel

9. **Dr. William Arthur Valentine Clark**

UCLA Geography  
Box 951524, 1255 Bunche Hall  
Los Angeles, CA 90095-1524  
(310) 273-0264

10. **Josephine Giambanco**

c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200

11. **Mark Andrew Jones** (in a Federal Rule of Civil Procedure 30(b)(6) capacity)

c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200

Plaintiffs may call:

1. **Ivan Yacub, Esq.**

Yacub Law Office  
12761 Darby Brook Court, Suite 102  
Woodbridge, VA 22192  
(703) 533-2347

2. **Peter Douglas Lawson Williams**

c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200

3. **Albert Dwoskin**

c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200

4. **Carolina Easton**

c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200

5. **Brady M. Bustany**

Corporate Counsel  
Yardi Systems, Inc.  
430 S Fairview Ave  
Santa Barbara, CA 93117  
800-866-1124 x1671

6. **Corporate Representative, RentGrow, Inc., d/b/a Yardi Resident Screening/Yardi Systems, Inc. (parent company)**

c/o Brady M. Bustany  
Corporate Counsel  
Yardi Systems, Inc.  
430 S Fairview Ave  
Santa Barbara, CA 93117

- II. FRCP 26(a)(3)(A)(ii):** the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition

Plaintiffs do not anticipate presenting any witness testimony by means of a deposition at this time. Plaintiffs reserve the right to present deposition testimony should any witness become unavailable.

- III. FRCP 26(a)(3)(A)(iii):** an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises

Plaintiffs expect to offer as exhibits the documents listed in Appendix A. Certain of these exhibits may be used only if the need arises. Plaintiffs also reserve the right to use any exhibit listed on Defendants' exhibit list, and to use any additional material for impeachment and/or rebuttal. Plaintiffs reserve the right to add, remove, and change exhibits as appropriate based on circumstances as they may evolve during trial.

#### IV. Statement of Undisputed Facts

The parties have filed a Joint Stipulation of Uncontested Facts separately.

DATED: Washington, D.C.  
February 2, 2017



By: \_\_\_\_\_

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*Counsel for Plaintiffs*

**Appendix A**

**Plaintiffs' Exhibit List**

**I. Declarations and Reports**

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
Declaration of Brady M. Bustany (11/13/2016)	N/A	N/A
Declaration/Expert Report of Ivan Yacub, Esq. (10/28/2016)	N/A	N/A
Declaration/Expert Reports of Professor William A.V. Clark (12/22/2016)	N/A	N/A
Dr. Weinberg's Reproduction of the Mathematical Calculations from his Expert Report (1/4/2017)	N/A	N/A

**II. Written Discovery**

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
Portions of Defendants' Answer to Interrogatories Not Specifically Objected to by Plaintiffs	N/A	N/A
Portions of Defendants' Responses to Jose Dagoberto Reyes's First Set of Interrogatories Not Specifically Objected to by Plaintiffs	N/A	N/A
Defendants' Supplemental Answer to Interrogatory 6	N/A	N/A

**III. Plaintiffs' Lease Materials**

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
Felix Bolaños Application for Residency (Dwoskin & Associates)	WAPLES00000115	WAPLES00000115
Jose Reyes Application for Residency (Dwoskin & Associates) (5/18/2013)	GIRON00000695	GIRON00000695
Jose Reyes Application for Residency (JBG Companies) (2016)	GIRON00000994	GIRON00000995
Rosy Giron de Reyes Application for Residency (JBG Companies) (2016)	GIRON00001194	GIRON00001195
Esteban Moya Application for Residency (Dwoskin & Associates) (12/07/2010)	WAPLES00000974	WAPLES00000975
Herbert Saravia Cruz Application for Residency (Dwoskin & Associates) (1/07/2012)	WAPLES00000343	WAPLES00000346
Mario Medina Application for Residency (Dwoskin & Associates) (1/31/2012)	WAPLES00000347	WAPLES00000347

Application for Residency as Occupant (3/10/2009)	WAPLES00000761	WAPLES00000762
Application for Residency as Leaseholder (5/5/2009)	WAPLES00000763	WAPLES00000766
Application for Residency as Occupant (5/5/2009)	WAPLES00000767	WAPLES00000769
Application for Residency as Leaseholder (8/25/2010)	WAPLES00000770	WAPLES00000773
Application for Residency as Occupant (8/25/2010)	WAPLES00000774	WAPLES00000776
Application for Residency as Leaseholder (8/10/2011)	WAPLES00000777	WAPLES00000779
Application for Residency (8/12/2013)	WAPLES00000780	WAPLES00000780
Application for Residency (12/4/2015)	WAPLES00000781	WAPLES00000781
Application for Residency (1/28/2016)	WAPLES00000782	WAPLES00000782
Application for Residency (7/27/2016)	WAPLES00000783	WAPLES00000783
2015-2016 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000051	WAPLES00000053
2015-2016 Mobile Home Lease Agreement between Esteban Moya and Defendants	GIRON00000642	GIRON00000652
2015-2016 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	GIRON00000844	GIRON00000846
2011-2012 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000920	WAPLES00000921
2014-2015 Mobile Home Lease Agreement between Esteban Moya and Defendants	GIRON00000653	GIRON00000655
2012-2013 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000254	WAPLES00000255
2014-2015 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000247	WAPLES00000249
2014-2015 Mobile Home Lease Agreement between Jose Reyes and Defendants	WAPLES00000433	WAPLES00000443
2012-2013 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000082	WAPLES00000083
2013-2014 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000080	WAPLES00000081
2014-2015 Mobile Home Lease Agreement between Felix Bolaños and Defendants.	WAPLES00000077	WAPLES00000079
Addendum to 2014-2015 Lease Agreement between Felix Bolaños and Defendants	WAPLES00000086	WAPLES00000091
Manufactured Home Site Rental Agreement between Felix Bolaños and Ruth Rivas and	GIRON00000885	GIRON00000893

Meadows of Chantilly Manufactured Home Community (9/30/2016)		
2012-2013 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000918	WAPLES00000919
2014-2015 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000897	WAPLES00000899
2013-2014 Mobile Home Lease Agreement between Jose Reyes and Defendants	WAPLES00000484	WAPLES00000496
2013-2014 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000916	WAPLES00000917
2015-2016 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000840	WAPLES00000842
2013-2014 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000250	WAPLES00000251
Utility Addendum to 2014-2015 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000256	WAPLES00000257
Utility Addendum to 2014-2015 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000084	WAPLES00000085
Lease Addendum to 2014-2015 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000086	WAPLES00000091
Lease Addendum signed by Felix Bolaños and Josephine Giambanco (undated)	WAPLES00000056	WAPLES00000061
Utility Addendum to 2015-2016 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000054	WAPLES00000055
Utility Addendum to 2014-2015 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000900	WAPLES00000901
Lease Addendum signed by Herbert Saravia Cruz, Mario Medina, and Yvette Jimenez (2015)	WAPLES00000216	WAPLES00000221
Lease Addendum signed by Jose Reyes (2014)	WAPLES00000438	WAPLES00000442
Lease Addendum signed by Esteban Moya (2014)	WAPLES00000845	WAPLES00000850
Lease Addendum (8/11/2016)	WAPLES00000790	WAPLES00000795
Lease Addendum (1/2014)	WAPLES00000784	WAPLES00000789
Rules and Regulations for Chantilly Manufactured Home Community signed by Ruth Rivas and Felix Bolaños (2016)	GIRON00000874	GIRON00000884
Mobile Home Park Rules and Regulations, signed by Felix Bolaños (2012)	WAPLES00000092	WAPLES00000101

Mobile Home Park Rules and Regulations, signed by Esteban Moya (2011)	WAPLES00000922	WAPLES00000927
Mobile Home Park Rules and Regulations, signed by Esteban Moya (2014)	WAPLES00000902	WAPLES00000911
Mobile Home Park Rules and Regulations, signed by Herbert Saravia Cruz and Mario Medina (2012)	WAPLES00000268	WAPLES00000273
Mobile Home Park Rules and Regulations, signed by Herbert Saravia Cruz and Mario Medina (2014)	WAPLES00000258	WAPLES00000267
Criminal Background Check for Rosy Giron de Reyes (12/04/2015)	GIRON00000696	GIRON00000697
Resident Screening Report for Herbert Saravia Cruz (2/03/2012)	WAPLES00000288	WAPLES00000295
Resident Screening Report for Jose Reyes (5/20/2013)	WAPLES00000500	WAPLES00000507
Resident Screening Report for Esteban Moya (12/09/2010)	WAPLES00000930	WAPLES00000937
Core Logic Reports for Male Plaintiffs	RPS000009	RPS000016
Renewal Letter from Defendants to Jose Reyes/Letter to Jose Reyes Adding Wife to Account (2015)	GIRON00000730	GIRON00000733
Lease Renewal Letter from Defendants to Jose Reyes and All Occupants (2015)	WAPLES00000431	WAPLES00000431
Renewal Notices to Esteban Moya (2011-2013)	WAPLES00000854	WAPLES00000896
Mobile Home Inspection for Herbert Saravia Cruz (2014)	WAPLES00000274	WAPLES00000275
Mobile Home Inspection for Felix Bolaños (2016)	WAPLES00001859	WAPLES00001859
Handwritten Note from Esteban Moya, including renter's insurance and airline ticket (1/11/2016)	WAPLES00000979	WAPLES00000988
Mobile Home Inspection for Esteban Moya (2016)	WAPLES00001064	WAPLES00001065

#### IV. Documents Defining Defendants' Policy

Description	Begin Bates	End Bates
Future Resident Information Guide (5/18/2006)	WAPLES00000733	WAPLES00000734
Future Resident Information Guide (10/18/2006)	WAPLES00000735	WAPLES00000736
Future Resident Information Guide (1/17/2011)	WAPLES00000737	WAPLES00000737
Future Resident Information Guide (3/4/2011)	WAPLES00000738	WAPLES00000738
Future Resident Information Guide (6/27/2011)	WAPLES00000739	WAPLES00000740
Future Resident Information Guide (3/23/2012)	WAPLES00000741	WAPLES00000742
Future Resident Information Guide (4/25/2012)	WAPLES00000743	WAPLES00000744

Future Resident Information Guide (9/11/2013)	WAPLES00000745	WAPLES00000746
Future Resident Information Guide (3/20/2014)	WAPLES00000747	WAPLES00000748
Future Resident Information Guide (5/14/2015)	WAPLES00000749	WAPLES00000750
Future Resident Information Guide (9/8/2015)	WAPLES00000751	WAPLES00000752
Future Resident Information Guide (3/31/2016)	WAPLES00000753	WAPLES00000754
Future Resident Information Guide (4/22/2016)	WAPLES00000755	WAPLES00000756
Future Resident Information Guide (5/16/2016)	WAPLES00000757	WAPLES00000758
Future Resident Information Guide (8/10/2016)	WAPLES00000759	WAPLES00000760

**V. Internal Defendant Guides, Memoranda, and Other Business Documents**

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
Resident Selection and Occupancy Standards (2/19/2013)	WAPLES00002320	WAPLES00002351
Resident Selection and Occupancy Standards (9/13/2013)	WAPLES00002680	WAPLES00002712
Resident Selection and Occupancy Standards (10/25/2013)	WAPLES00002801	WAPLES00002832
Resident Selection and Occupancy Standards (11/1/2013)	WAPLES00002764	WAPLES00002795
Resident Selection and Occupancy Standards (4/20/2015)	WAPLES00002602	WAPLES00002633
Resident Selection and Occupancy Standards (5/8/2015)	WAPLES00002502	WAPLES00002533
CoreLogic Contract with A.J. Dwoskin (6/20/2001)	RPS000001	RPS000008
A.J. Dwoskin Consumer Reports & CoreLogic SafeRent Training Manual (1/24/2011)	WAPLES00000572	WAPLES00000732
Yardi RentGrow Screening Services Activation Agreement (4/26/2013)	WAPLES00000814	WAPLES00000826
Yardi Resident Screening (2013)	WAPLES00000796	WAPLES00000813
Resident Ledger for Jose Reyes (11/17/2016)	WAPLES00003117	WAPLES00001323
Resident Ledger for Felix Bolaños (11/17/2016)	WAPLES00003098	WAPLES00003106
Resident Ledger for Esteban Moya (11/17/2016)	WAPLES00003107	WAPLES00003116
Resident Ledger for Herbert Saravia Cruz (11/17/2016)	WAPLES00003124	WAPLES00003134
Residential Marketing Plan (2014)	WAPLES00001676	WAPLES00001693
“Daily Happenings at Bull Run & Waples” for 8/28/2015	WAPLES00001498	WAPLES00001499
List of Noncompliant Waples Tenants and Outstanding Documentation; Violation Letters (2015-2016)	WAPLES00001272	WAPLES00001330
Move Out Report: Waples Project LP	WAPLES00002981	WAPLES00002981

"Daily Happenings at Bull Run & Waples" for 2/11/2016	WAPLES00001435	WAPLES00001438
List of Individuals Who Received Background Check	WAPLES00001338	WAPLES00001350
Organizational Chart for Waples Mobile Home Park LP	WAPLES00001331	WAPLES00001331
Grace Hill Certificates of Achievement for Valerie Dixon, Carolina Easton, Mayra Lopez, Jessica Armstead, Mark Jones, and Josephine Giambanco	WAPLES00001257	WAPLES00001263
List of Waples Residents (redacted by Defendants)	WAPLES00001335	WAPLES00001337

## VI. Defendants' Internal Correspondence

Description	Begin Bates	End Bates
Email from Peter Williams to Distribution List with Attachments (11/9/2015)	WAPLES00001724	WAPLES00001733
Email from Theresa Osborne to Peter Williams (10/28/2013)	WAPLES00002800	WAPLES00002832
Email from Peter Williams to Albert Dwoskin (6/19/2015)	WAPLES00001503	WAPLES00001507
Email between Peter Williams and Theresa Osborne with Attachment (5/14/2014)	WAPLES00002355	WAPLES00002357
Email from Carolina Easton to Peter Williams, Mark Jones, and Others with Attachment (5/15/2015)	WAPLES00002501	WAPLES00002533
Email between Josephine Giambanco, Lindsay Gilbert, Theresa Osborne, and Others with Attachment (3/20/2014)	WAPLES00001367	WAPLES00001371
Email from Theresa Osborne to Peter Williams with Attachment (1/7/2013)	WAPLES00002833	WAPLES00002865
Email from Theresa Osborne to "Residential Managers" with Attachment (12/20/2013)	WAPLES00002239	WAPLES00002271
Email from Peter Williams to Julia Edwards (Core Logic) (8/29/2011)	WAPLES00001723	WAPLES00001723
Email from Peter Williams to Albert Dwoskin with Attachment (11/10/2015)	WAPLES00001488	WAPLES00001496
Email between Carolina Easton, Jessica Armstead, and Josephine Giambanco (1/14/2016)	WAPLES00002433	WAPLES00002435
Email between Carolina Easton, Josephine Giambanco, and Carolina Easton with Attachment (5/19/2014)	WAPLES00002278	WAPLES00002280

Email between Carolina Easton, Josephine Giambanco, Mark Jones, and Others, with Attachments (5/17/2016)	WAPLES00002441	WAPLES00002457
Email between Carolina and Josephine Giambanco with Attachments (8/17/2016)	WAPLES00002272	WAPLES00002277
Email between Josephine Giambanco, Carolina Easton, and Jessica Armstead with Attachments (2/3/2016)	WAPLES00001783	WAPLES00001789
Email between Carolina Easton, Josephine Giambanco, Jessica Armstead, and Mark Jones (8/29/2016)	WAPLES00002925	WAPLES00002930
Email from Sabiha Noorzai to "Daily Reports" (7/29/2011)	WAPLES00001470	WAPLES00001470
Email from Cliff Liautaud to Josephine Giambanco and Mayra Lopez with Attachment (4/22/2016)	WAPLES00001532	WAPLES00001535
Email from Cliff Liautaud to Josephine Giambanco and Mayra Lopez with Attachment (5/16/2016)	WAPLES00001521	WAPLES00001524
Email between Carolina Easton and Lindsay Gilbert (9/3/2014)	WAPLES00001619	WAPLES00001620
Email between Carolina Easton and Lindsay Gilbert (9/3/2014)	WAPLES00001616	WAPLES00001618
Email between Jessica Armstead, Carolina Easton, "Residential Managers" and "Residential Assistant Managers" (8/22/2016)	WAPLES00001425	WAPLES00001427
Email between Carolina Easton, Mark Jones, and Peter Williams (4/28/2015)	WAPLES00002978	WAPLES00002979
Email from Valerie Dixon to Josephine Giambanco with attachment (2/11/2016)	WAPLES00001605	WAPLES00001607
Email between Josephine Giambanco and Carolina Easton (3/18/2016)	WAPLES00002964	WAPLES00002965
Email from Carolina Easton to Peter Williams with Attachment (3/17/2014)	WAPLES00002634	WAPLES00002645
Email from Josephine Giambanco to Carolina Easton with Attachment (4/28/2014)	WAPLES00002281	WAPLES00002283
Email between Carolina Easton, Josephine Giambanco, Mark Jones, and Others (10/28/2015)	WAPLES00001571	WAPLES00001574
Email between Carolina Easton, Josephine Giambanco, and Mark Jones (8/25/2016)	WAPLES00002972	WAPLES00002977
Email between Carolina Easton, Mark Jones, Valerie Dixon, and Jessica Armstead with Attachment (5/3/2016)	WAPLES00002796	WAPLES00002798
Email from Mark Jones to Carolina Easton and Jessica Armstead with Attachment (5/3/2016)	WAPLES00002426	WAPLES00002427

Email from Carolina Easton to Mark Jones and Jessica Armstead with Attachment (5/17/2016)	WAPLES00002451	WAPLES00002459
Email between Mark Jones and Kevin Ortega ofYardi (5/27/2016)	WAPLES00002417	WAPLES00002420
Email from Mayra Lopez to Josephine Giambanco (3/2/2016)	WAPLES00001384	WAPLES00001384
Email between Josephine Giambanco, Yvette Jimenez, and Carolina Easton with Attachment (5/19/2014)	WAPLES00002278	WAPLES00002280
Email from Josephine Giambanco to Carolina Easton with Attachment (3/21/2014)	WAPLES00002284	WAPLES00002285
Email between Carolina Easton and Josephine Giambanco (5/17/2013)	WAPLES00001372	WAPLES00001373
Email from Carolina Easton with Attachment (9/29/2015)	WAPLES00002208	WAPLES00002209
Email from Josephine Giambanco to Valerie Dixon (5/11/2016)	WAPLES00002447	WAPLES00002448
Email from Theresa Osborne to “Residential Managers and “Residential Assistant Managers” (7/15/2013)	WAPLES00001459	WAPLES00001459

## VII. Eviction Correspondence with and Related to Plaintiffs

Description	Begin Bates	End Bates
Violation Letter from Defendants to Esteban Moya (1/18/2016)	WAPLES00001141	WAPLES00001143
Violation Letter from Defendants to Herbert Saravia Cruz and Mobile Home Inspection Form (1/18/2016)	WAPLES00001854	WAPLES00001855
Letter Informing Residents of Month to Month Surcharge Increase to \$300 (3/11/2016)	GIRON00000033	GIRON00000033
Eviction Letter to Jose Reyes (2/4/2016)	GIRON00000698	GIRON00000698
Letter from Herbert Saravia Cruz to Defendants Regarding Sale of Mobile Home (1/27/2016)	WAPLES00000198	WAPLES00000198
Violation Letter from Defendants to Felix Bolaños (3/2/2016)	WAPLES00001332	WAPLES00001332
Violation Letter from Defendants to Herbert Saravia Cruz (1/18/2016)	WAPLES00000199	WAPLES00000199
21/30 Notice to Jose Reyes and All Occupants (1/27/2016)	WAPLES00001785	WAPLES00001789
Letter from Voice to Albert Dwoskin (8/12/2016)	WAPLES00002992	WAPLES00003002
Letter from VA Senators to Mike Dean (7/22/2016)	WAPLES00003004	WAPLES00003004
Audio File (3/2016)	GIRON00000045	GIRON00000045
Audio File (3/2016)	GIRON00000048	GIRON00000048

Email between Jeff Franzen and Simon Sandoval-Moshenberg regarding Dwoskin Evictions (11/20/2015)	GIRON00000133	GIRON00000134
Notice to Jose Reyes of Acceptance of Rent with Reservation to Proceed with Eviction (2/03/2016)	GIRON00000693	GIRON00000693
60 Day Termination Notice from Defendants to Esteban Moya and All Occupants (11/30/2016)	N/A	N/A
Notice of Acceptance of Rent with Reservation to Proceed with Eviction from Defendants to Esteban Moya and All Occupants (12/5/2016)	N/A	N/A

### VIII. Publicly Available Records and Documents

Description	Begin Bates	End Bates
<i>The Washington Post</i> : “Without Social Security numbers, illegal immigrants face eviction” (2/10/2016)	WAPLES00001356	WAPLES00001358
“Overview of Race and Hispanic Origin: 2010” (2010 Census Briefs) (3/2011)	GIRON00000589	GIRON00000612
“Profile of the Unauthorized Population: Fairfax County, VA”	GIRON00000613	GIRON00000622
“2010-2014 American Community Survey 5 Year Estimates”: Units in Structure	GIRON00000523	GIRON00000524
“2010-2014 American Community Survey 5 Year Estimates”: Selected Characteristics of the Native and Foreign-Born Populations	GIRON00000525	GIRON00000533
“Unauthorized Immigrant Totals Rise in 7 States, Fall in 14: Decline in those from Mexico fuels most state decreases” (11/18/2014)	GIRON00000218	GIRON00000271
“Fairfax County Department of Housing and Community Development Semi Annual At Risk Housing Report” (6/25/2010)	GIRON00000574	GIRON00000582
“2010-2014 American Community Survey 5 Year Estimates”: Housing Units	GIRON00000522	GIRON00000522
“Estimates of the Unauthorized Population for States” Data for Virginia	N/A	N/A
“Quick Facts: Virginia”	N/A	N/A
“2010-2014 American Community Survey 5-Year Estimates”: Housing Units for Fairfax County	N/A	N/A
“2010-2014 American Community Survey 5-Year Estimates”: Units in Structure for Virginia	N/A	N/A
“2010-2014 American Community Survey 5-Year Estimates”: Units in Structure for Fairfax County	N/A	N/A

“2010-2014 American Community Survey 5-Year Estimates”: Selected Characteristics of the Native and Foreign-Born Populations for Virginia	N/A	N/A
<i>The Washington Post</i> : “Undocumented Latinos and their families sue after evictions” (5/23/2016)	N/A	N/A

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of February, 2017, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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